



July 21, 2011

Ms. Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve
20th Street and Constitution Avenue, N.W.
Washington, DC 20551
Re: Docket No. R-1419: Regulation E Revisions

Dear Ms. Johnson,

Regions Financial Corp.¹ appreciates the opportunity to comment on proposed revisions to Regulation E (12 CFR Part 205) regarding new protections for consumers who send remittance transfers to consumers or entities in a foreign country. In particular, Regions would like to comment on specific areas where the proposed changes to the current regulation need to be reconsidered because they would lead to undue burdens on banks and unintended consequences on consumers. Our specific comments are outlined below.

Remittance Transfer Definitions – § 205.30

The original intention of the proposed changes was to protect consumers who utilize remittance transfer providers such as Western Union and MoneyGram to send funds to individuals in foreign countries. However, the way the proposed revisions to Regulation E are written, the new rules would apply to international wire transfers provided by federally insured financial institutions. The definition of “remittance transfer provider” in proposed 205.30(e) should be revised to exempt federally insured financial institutions, so that the regulation will apply to money transfers that are sent through money remittance providers as the proposed changes were originally intended.

In addition, the definition of “remittance transfer” in proposed section 205.30(d) should be revised to exempt all international wire transfers, especially given that wire transfers are not currently included in the definition of an “electronic funds transfer” as defined by Regulation E. We also request that ACH transfers and online banking bill pay transfers also be excluded from the definition of “remittance transfer” under the proposed rule. In the event that it is not practical to exclude all wire transfers, we request the exemption of international wire transfers over \$500.

¹ Regions Financial Corporation, with \$132 billion in assets, is a member of the S&P 100 Index and is one of the nation’s largest full-service providers of consumer and commercial banking, trust, securities brokerage, mortgage and insurance products and services. Regions serves customers in 16 states across the South, Midwest and Texas, and through its subsidiary, Regions Bank, operates approximately 1,800 banking offices and 2,200 ATMs. Its investment and securities brokerage trust and asset management division, Morgan Keegan & Company Inc., provides services from over 300 offices. Additional information about Regions and its full line of products and services can be found at www.regions.com.

Disclosures - § 205.31

If the exemptions requested above are not granted, then it will be burdensome, costly and time consuming to modify our current wire transfer disclosures or implement new disclosures as described in the proposed rule. Since many of our wire transfer disclosures print from our platform system, we will need ample time (at least 18 months) to program, test and implement the changes. In addition, we are in the process of replacing our current platform system with a new system. If we are allowed sufficient time to implement the disclosure changes, then we can avoid making costly and time consuming changes to our current system. We also question how the proposed changes to the wire transfer disclosures will benefit consumers when weighed against the time and expense of implementing these changes.

In addition, electronic funds transfers processed by remitting banks through SWIFT messaging network, as well as PACS messages, or open loop market clearing infrastructures like Fedwire, ACH, etc. should be exempt from disclosing fees and foreign exchange commissions other than those directly charged by the remitting institution to the remitter.

Procedures for Cancellation and Refund of Remittance Transfers - § 205.34

Due to the timing of when a wire transfer is submitted, it is not possible for a financial institution to allow a sender to cancel a wire transfer one business day after the sender makes payment. Once a wire transfer is sent, financial institutions do not have the capability of retracting those funds. For example, wire transfers sent through the Federal Reserve Bank Fedwire are processed real-time gross settlement on the same day.

Regions appreciates the opportunity to comment on this proposal. If you have further questions please contact Bill Simpson at (205) 264-4395.

Sincerely,

Bill Simpson

Bill Simpson
Senior Vice President
Retail Banking
Regions Financial Corporation